

EXHIBIT A

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UGOCHUKWU GOODLUCK
NWAUZOR, et al.,

Plaintiffs,

v.

THE GEO GROUP, INC.,

Defendant.

CASE NO. C17-5769 RJB

DECLARATION OF JENNIFER M. KEOUGH
REGARDING EXCLUSION REQUESTS

I, JENNIFER M. KEOUGH, declare as follows:

1. I am Chief Executive Officer of JND Legal Administration (“JND”). JND is a legal administration services provider with its headquarters in Seattle, Washington. JND has extensive experience with all aspects of legal administration and has administered settlements in hundreds of class action cases.

2. JND is serving as the notice administrator in the above-captioned litigation. This Declaration is based on my personal knowledge and information provided to me by experienced JND employees and, if called on to do so, I could and would testify competently thereto.

REQUESTS FOR EXCLUSION

3. JND has acted in accordance with the Stipulation Regarding Amended Notice Plan and Class Notices approved by the Court on January 30, 2020 in order to disseminate class notice information and provide class members with an opportunity to request exclusion from the class.

4. As of the date of this Declaration, JND has not received any exclusion requests.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on March 31, 2020, at Seattle, Washington.

By: _____

Jennifer M. Keough